

Mulvaney for Congress



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May 16, 2018

Jeff S. Jordan
Assistant General Counsel
Complaints & Legal Administration
Federal Election Commission
1050 First St., NW
Washington, DC 20463

RE: MUR 7336

Dear Mr. Jordan:

This letter is in response to MUR 7336, received by Pat Jenkins on April 16, 2018. As your letter indicates, Mulvaney for Congress was terminated by the Federal Election Commission on October 27, 2017 and currently has no remaining personnel.

MUR 7336 indicates that the American Democracy Legal Fund has filed a complaint against Mulvaney for Congress for converting campaign funds to personal use and running a "zombie campaign."

This letter verifies that all final expenses paid by the Committee were incurred either prior to notification by former Congressman Mulvaney that he would not be seeking re-election or were incurred during the wind down of Mulvaney for Congress.

Committee personnel contacted campaign vendors prior to terminating to collect any outstanding bills. These were then paid in full to settle all accounts. Personnel were also compensated for the wind down phase of the campaign. All other disbursements, made from surplus campaign funds, were either contributed to other Federal Committees, or after obtaining contributor permission, transferred to the non-federal committee, Mulvaney for SC Senate, to settle outstanding debt. None of these payments were personal use and all were either bona fide campaign operating expenses, expenses that only existed as a result of former Congressman Mulvaney serving in Congress, or were permissible use of surplus funds. The Committee did not disclose debt because it was unaware of the debt until vendors were contacted to obtain outstanding balance, and it had not previously received invoices for these amounts.

Mulvaney for Congress terminated less than one year after Congressman Mulvaney left office. The Committee argues that it is unreasonable to classify it as a "zombie campaign" because it terminated so quickly. There are many campaign committees that are in existence for years after the member leaves office that have never been questioned about ongoing expenses.

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Furthermore, the Commission terminated Mulvaney for Congress without any further questions and accepted the filing as accurate and all disbursements as legal.

Mulvaney for Congress respectfully requests that MUR 7336 be closed without further action.

Sincerely,

Pat Jenkins

Pat Jenkins
Treasurer

Paid for by Mulvaney for Congress